

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

**JUUL LABS, INC.,**

**Plaintiff,**

**v.**

**Civil Action No. 1:19-cv-00715**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**PLAINTIFF'S EX PARTE MOTION FOR TEMPORARY ASSET RESTRAINT  
AND EXPEDITED DISCOVERY**

Plaintiff Juul Labs, Inc., by counsel and pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, hereby moves for a Temporary Restraining Order, including a temporary asset restraint and expedited discovery.

For the reasons set forth in Plaintiff's accompanying memorandum, Plaintiff respectfully requests that this Court (1) issue a temporary restraining order freezing the assets of Defendants' PayPal accounts; and (2) permit limited expedited discovery directed to eBay and PayPal in order to determine Defendants' identity, the amount and location of the profits of Defendants' counterfeiting and infringement, and the scope of Defendants' activities.

Date: June 4, 2019

Respectfully submitted,

/s/ Monica Riva Talley

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